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November 21, 2017

VIA ECF

Honorable Katherine Polk Failla
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Hugo Orega Hernandez v. Muzzarella Inc., et al*
17-cv-6164 (KPF)

Dear Judge Failla:

I am an attorney with the office of Michael Faillace & Associates, attorneys for Plaintiff in the above-referenced matter. I write in response to individual defendant John Russo's letter to the court seeking an adjournment of the initial conference presently scheduled for November 30, 2017 at 3:30 p.m.

Plaintiff was going to seek an adjournment of the initial conference as well, given that none of the defendants, including Mr. Russo have answered. Plaintiff intended to seek an adjournment of the conference in order to file a motion for default judgment.

Plaintiff's counsel was contacted by an attorney at the end of October and stated that he was going to be retained by Mr. Russo and Muzzarella Inc. However, he informed me that he actually was not going to be retained. Mr. Russo never contacted Plaintiff's counsel for an extension of time to answer the complaint, and Plaintiff's counsel has not been contacted by Mr. Anthony Muzzarella. Moreover, given that Muzzarella Inc., the corporate defendant, has not answered and is not represented by counsel, it is in default. Accordingly, Plaintiffs respectfully request an adjournment of the initial conference in order to file for default against all defendants.

The parties thank the Court for its attention to this matter.

Respectfully Submitted,

/s/Sara Isaacson
Sara Isaacson